

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

Lee Steel Corporation, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 15-45784-mbm

Hon. Marci B. McIvor

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that Scott A. Wolfson of Wolfson Bolton PLLC appears, pursuant to Fed. R. Bankr. P. 9010(b) and 11 U.S.C. § 1109(b), as proposed counsel to the Official Committee of Unsecured Creditors ("Committee").

PLEASE TAKE FURTHER NOTICE that the Committee requests, pursuant to Fed. R. Bankr. P. 2002 and 11 U.S.C. § 1109(b), that copies of all notices and pleadings given or required to be given, and all papers served or required to be served, be given and served upon the following persons at the address, telephone number, facsimile number and email address indicated:

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PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. § 1109(b), this demand includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure, but also includes, without limitation, all orders and notices of any applications, petitions, motions, complaints, requests or demands, hearings, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document filed with, or

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<sup>1</sup> Debtors include Lee Steel Corporation, Case No. 15-45784-mbm; Taylor Industrial Properties, L.L.C., Case No. 15-45785-mbm, and 4L Properties, LLC, Case No. 15-45788-mbm.

otherwise brought before, this Court with respect to the above-referenced bankruptcy proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by U.S. mail, electronic mail, courier service, hand delivery, telephone, facsimile transmission, telegraph, telex or otherwise.

PLEASE TAKE FURTHER NOTICE that the Committee intends that neither this Notice of Appearance and Request for Service of Papers nor any later appearance, pleading, claim or suit shall waive: (i) the Committee's rights to have final orders in non-core matters entered only after *de novo* review by a District Court Judge; (ii) the Committee's right to trial by jury in any proceeding so triable in any case, controversy, or proceeding related to these bankruptcy proceedings; (iii) the Committee's rights to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which the Committee is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments the Committee expressly reserves.

Respectfully submitted,

WOLFSON BOLTON PLLC

Dated: April 30, 2015

By: /s/ Scott A. Wolfson  
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